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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

# IN RE BARD IVC FILTERS PRODUCTS LIABILITY LITIGATION

## This Document Relates to:

***Jerry Jones v. C.R. Bard, Inc., et al.***  
No. 2:16-cv-01314-DGC

No. 2:15-md-2641-PHX

## **MOTION FOR EXTENSION OF TIME TO COMPLETE PLAINTIFF PROFILE FORM**

**MAY IT PLEASE THE COURT:**

In support of Plaintiff's Motion for Extension of Time to Complete the Plaintiff Profile Form in the above case, Plaintiff states the following:

## **FACTUAL BACKGROUND**

1. Counsel for Plaintiff Jerry Jones filed his Bard IVC Short Form Complaint in the United States District Court for the District of Arizona on May 3, 2016.
2. Pursuant to Case Management Order No. 5, the Plaintiff Profile Form for Plaintiff is due July 2, 2016.
3. Plaintiff has completed and signed the Plaintiff Profile Form to the best of his ability without having access to his medical records. However, Plaintiff

is unable to fully and accurately respond to the entirety without those medical records.

4. Plaintiff's counsel requested Plaintiff's medical records on or before March 10, 2016. Due to a number of issues with the facility, including various HIPAA authorization problems, the records have still not been provided to Plaintiff's counsel.
5. Plaintiff's medical record service has informed Plaintiff's counsel that these record have been ordered and Plaintiff's counsel are only waiting for delivery. However, Plaintiff's medical record service cannot provide any approximate time for the delivery of these records.
6. Plaintiff and Plaintiff's counsel have made substantial good faith efforts to acquire Plaintiff's medical records and the instant delay is due entirely to circumstances outside of their control.

WHEREFORE, Plaintiffs request an extension of time of 60 days (until August 31, 2016) to complete the Plaintiff Profile Form.

RESPECTFULLY SUBMITTED this 13th day of July, 2016.

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